

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

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|---------------------------------------|---|----------------------|
| Kangol LLC |) | |
| |) | |
| |) | |
| |) | |
| Plaintiff, |) | |
| v. |) | |
| |) | |
| |) | Case No.: 24-cv-1636 |
| |) | |
| The Partnerships and Unincorporated |) | |
| Associations Identified on Schedule A |) | |
| |) | |
| |) | |
| Defendants. |) | |
| |) | |

PLAINTIFF’S AMENDED MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Kangol LLC (“Plaintiff” or “Kangol”) files this Motion requesting leave to file the following documents under seal: (1) Schedule A attached to the Complaint, which lists the fully interactive, e-commerce stores operating under the seller aliases (the “Seller Aliases”) and the e-commerce store urls under the Online Marketplaces; (2) the Declaration of Sean McCabe (Exhibit H to the Complaint) and Exhibit 1 and 2 thereto, which includes screenshot printouts showing the product listings operated by the Seller Aliases; (3) Kangol’s original Memorandum in support of its Motion for Temporary Restraining Order, which includes certain identifying information for the product listings operated by the Seller Aliases; and (4) Kangol’s Amended Memorandum in support of its Motion for Temporary Restraining Order, which includes certain identifying information for the product listings operated by the Seller Aliases.

In this action, Kangol is requesting temporary *ex parte* relief based on an action for trademark infringement, counterfeiting, and false designation of origin. Sealing this portion of the file is necessary to prevent the Defendants from learning of these proceedings prior to the execution of the temporary restraining order. If Defendants were to learn of these proceedings

prematurely, the likely result would be the destruction of relevant documentary evidence and the hiding or transferring of assets to foreign jurisdictions, which would frustrate the purpose of the underlying law and would interfere with this Court's power to grant relief. If and once the temporary restraining order has been issued and served on the relevant parties and the requested actions are taken, Kangol will move to unseal these documents.

Date: February 29, 2024

Respectfully submitted,

/s/ Todd R. Tucker

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